Desk Clerk to File Please

U. S. Bankruptcy Court
226 West Second Street
Flint, MI 48502

In Re: Helen Y. Cameron, Debtor, Pro Se, Chapter 13
Case No: 16-32931-dof

DEBTOR'S REPLY AND OBJECTION TO AND MOTION TO STRIKE TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO REINSTATE CASE

NOW COMES Helen Y. Cameron, the Chapter 13 Debtor, and offers her Reply and Objection to Trustee's Objection to Debtor's Motion to Reinstate Case and Debtor moves to Strike Trustee's Objection to said Motion. In support of Debtor's reinstatement and continued Chapter 13 case, Debtor states as follows:

1. The Trustee opposes reinstatement of the case for no lawful grounds. The Trustee's opposition was dated January 2, 2017 yet postmarked February 7, 2017 (see copies of Trustee's Motion and postmarked envelope attached to this motion, pages 3 - 6). Debtor received the Trustee's opposition on or about February 10. The Debtor is responding expediently to Trustee's stated concerns.
2. The Debtor filed her Voluntary Petition in December, 2016 less than a month before Trustee began her quest for automatic and instant dismissal of the case without any prior notice or opportunity for Debtor to be heard in her own defense.
3. In the Voluntary Petition and attachments, including the Matrix List of Creditors, Debtor made every effort to identify herself as a (person) and to sufficiently describe her financial status until other required documents could be filed.
4. In addition, in January, 2017, Debtor filed a Motion requesting additional time to February 17 to file any additional required documents including the Chapter 13 Plan (there has been no ruling on that Motion to date). Creditors have not moved

4. for relief from stay nor have any creditors opposed the treatment they are currently receiving therefore none are being prejudiced. All due filing and administrative fees are current.
5. Debtor believes Venue in this Court is proper and the Debtor has met all requirements of the Code and Debtor is in compliance with all orders of the Court.
6. The new Code requires the case managers to administer moreso by the facts than by the calendar. Debtor is working as fast as possible to get the required missing documents filed error-free.

Wherefore, the Debtor requests that this Honorable Court, 1) require the Trustee to follow procedural Rules in administering this case as Debtor is not an attorney and is not privileged to "legal brotherhood-strategies and shortcuts", and, 2) in the alternative, allow the Debtor's motion to reinstate Chapter 13, and 3) grant any other relief as this Court deems fair and just.

Dated: February 10, 2017

/s/ Helen Cameron
mail: POB 672
Boston, MA 02126

CERTIFICATE OF SERVICE: I, Helen Y. Cameron, state that on February 10, 2017, I mailed a copy of this DEBTOR'S REPLY AND OBJECTION TO AND MOTION TO STRIKE TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO REINSTATE CASE with sufficient postage attached to:

Office of the Clerk
United States Bankruptcy Court
Eastern District of Michigan at Flint
226 West Second Street
Flint, MI 48502

Carl L. Bekifske
Chapter 13 Standing Trustee
400 N. Saginaw St. 331
Flint, MI 48502

signed: Helen Cameron ______________ 2/10/17

Page 3
Re: 2/10/17

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – FLINT

IN THE MATTER OF:

Helen Y. Cameron

Debtor(s).

Case No. 16-32931
Chapter 13
Hon. Daniel S. Opperman

For Reference only
Do Not Process

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO REINSTATE CASE

NOW COMES the Chapter 13 Standing Trustee, Carl L. Bekofske, and objects to Debtor's Motion to Reinstate Case and in support thereof states as follows:

1. The Trustee opposes reinstatement of this case.
2. No financial documents have been received by the Chapter 13 Trustee.
3. The required pleadings such as plan, schedules, statement of financial affairs and means test have not been filed with this Court.
4. Debtor has not shown that she qualifies to be a Debtor under Chapter 13 in that she has a regular source of income of which to fund a Chapter 13 plan.
5. It is unclear based upon the Petition whether the Debtor has met the venue requirements to file a case in this District.

Case #1632931 - Page 4
dof
Re: 2/10/17

WHEREFORE, the Chapter 13 Standing Trustee requests that this Honorable Court deny the Debtor's motion to reinstate Chapter 13, and grant any further and other relief as this Court deems equitable and just.

For Reference Only
Do Not Process

Dated: January 2, 2017

/s/ Carl L. Bekofske
Carl L. Bekofske (P10645)
Chapter 13 Standing Trustee
400 N. Saginaw St. 331
Flint, MI 48502
(810) 238-4675
ecf@flint13.com

Page 5
Re: 2/10/17

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - FLINT

For Reference Only
Do Not Process

IN THE MATTER OF:

Helen Y. Cameron

Case No. 16-32931
~~Chapter 13~~
Hon. Daniel S. Opperman

Debtor(s).

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2017, I electronically filed the Chapter 13 Trustee's Objection to Debtors' Motion to Reinstate Case with the Clerk of the Court using ECF system; which will send notification to the following:

n/a

The following parties were served via First Class Mail at the address below by depositing same in a United States Postal Box with the lawful amount of posting affixed thereto:

Helen Y. Cameron
P. O. Box 260672
Boston, MA 02126

/s/ Sherry Beasinger
Sherry Beasinger
Office of Chapter 13 Standing Trustee
400 N. Saginaw St. 331
Flint, MI 48502
(810) 238-4675
ecf@flint13.com

CARL L. BEKOFSKE
STANDING CHAPTER 13 TRUSTEE AT FLINT
400 N. SAGINAW STREET, SUITE 331
FLINT, MI 48502

ADDRESS SERVICE REQUESTED

UNITED STATES POSTAGE
PITNEY BOWES
$ 00.46⁰
02 1M
0004226196 FEB07 2017
MAILED FROM ZIP CODE 48502

HELEN Y. CAMERON
P. O. BOX 260672
BOSTON, MA 02126

02126-001272

For Reference Only
Do Not Process

Page 6
Case# 16 32931-dof
Re: 2/10/17